basis for amended claim 17.

Rejection Under 35 U.S.C. § 103

Claims 14-15, 18-19, and 25-26 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Ludwig *et al.* (US Patent No. 5,854,893, hereinafter Ludwig). Applicants respectfully traverse this rejection, based at least on the following arguments.

Ludwig describes a multimedia collaboration system that integrates real-time audio/video with control signals and textual, graphical and other data across different computer and network operating system platforms (Ludwig, Abstract). The collaboration used by participants of the Ludwig system (e.g., video call, snapshot sharing, conference, etc.) are limited to services provided by each client program on each workstation. Ludwig does not provide any web-based tools. (Col 21; lines 7 - 17). The service server is part of the MLAN (multimedia local area network) server software as depicted in Fig. 21. However, each client also needs to support a service before that service can be provided to a user. Hence in the system described by Ludwig, users collaborate using a predefined network environment based on the services each client can support.

The present invention is different from Ludwig where the collaborations are in a predefined network environment; instead the user defines the network environment without regard for services supported by the user's machine. The Applicants describe (page 41 line 24 to line 28 and page 75 lines 5 to line 16) a user-defined network environment where an environment generator is used to create a network environment. In addition, the environment generated by the user is not limited to the programs in a specific server in a local area network. The user can select programs and tools from the Internet and/or any of the computers in the network. Thus, Ludwig does not teach or

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suggest automatically creating a user-defined networked environment as recited in independent claim 14.

Ludwig also does not disclose the use of "web-based tools." The Office Action is incorrect in suggesting that the Posle browser in Fig. 2A disclosed by Ludwig is referring to "web-based tools" or the "Internet." The Posle browser is not a "web browser" or the "Internet" it is simply a "display feature" specific to the Ludwig invention. Moreover, even if WAN (wide area network) is interpreted as the "Internet" as the Office Action alleges, there is no use of a WAN in any part of the service server that limits the collaboration of Ludwig. Therefore, it is incorrect to suggest that Ludwig is teaching the use of "Internet" or "web-based tools" in creating a user-defined network environment, as described in the present invention.

In summary, Ludwig describes a predefined network environment limited to programs registered on service server 69. Ludwig does not disclose use of web-based tools in the collaboration nor does it disclose the software that generates the dynamic user-defined network environment of the present invention. Hence, claim 14 would not have been obvious to one of ordinary skill without the web-based tools available to group members and the software that creates the user-defined network environment. Claim 14 is thus in condition for allowance. For same reasons, claims 15, 18-19 and 25-26 are patentable over Ludwig.

The Office Action also rejects claims 16-17, 20-24, 27-31, and 33-38 under 35 U.S.C. § 103(a) as being unpatentable over Ludwig in view of Walker *et al.* (US Patent No. 6,240,396), Ferguson *et al.* (US Patent No. 6,240,396), *Microsoft Press Computer Dictionary, Third Edition* Page 169, or Axaopoulus *et al.* (US Patent No. 6,240,396).

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However, all these document fail to remedy the deficiencies of Ludwig, e.g., including a lack of a user-defined network environment and web-based tools. Therefore these documents do not, in any combination, teach or suggest the user-defined network environment described and claimed in the present application.

New Claims

Applicants have added new claims 39-42. Claims 39-40, dependent back to claim 14, recite that the user-defined networked environment is created and accessed via a single network, such as the Internet. Claim 41 is a new independent claim, similar in scope to claim 14, reciting that the user-defined networked environment is created and accessed via a single network. Claim 42, dependent from claim 41, recites that the single network comprises the Internet. Because Ludwig requires the use of two separate networks (Ludwig, col. 3, lines 35-45), these claims are allowable over the cited art of record. Support for the new claims can be found in the original application as filed, at least on pages 9-11, 18, and 20. No new matter has been added.

Conclusion

Applicants respectfully request withdrawal of the rejections, and that the application be passed to issue at the examiner's earliest convenience. If the examiner does not believe the application is in condition for allowance, the examiner is invited to contact the undersigned at (202) 508-9160.

Respectfully submitted,

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Appendix

A marked-up copy of amended claim is herein provided:

     17. The method of claim 14, further comprising the step of screening prospective members that respond to ~~the~~ <u>an</u> advertisement in order to determine whether they should be added to the group.